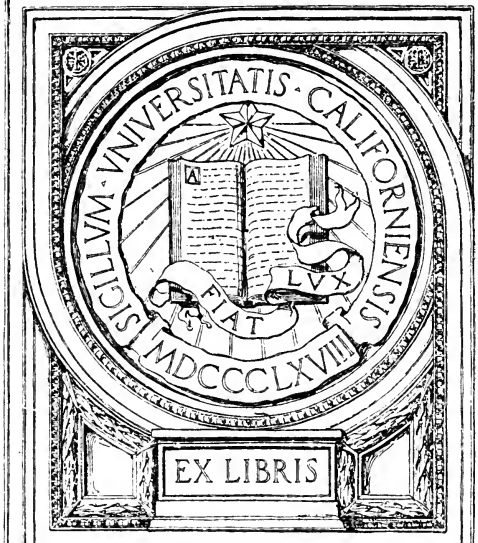
SIGILLVM · VNIVERSITATIS · CALIFORNIENSIS
LVX
FIAT
MDCCCLXVIII
EX LIBRIS

Legislative Reference Bureau.

JAMES N. MOORE, Director.

BILL DRAFTING

BY

JAMES McKIRDY, Assistant Director.

HARRISBURG:
C. E. AUGHINBAUGH, PRINTER TO THE STATE OF PENNSYLVANIA
1912.

Legislative Reference Bureau.

JAMES N. MOORE, Director.

BILL DRAFTING

BY

JAMES McKIRDY, Assistant Director.

HARRISBURG:
C. E. AUGHINBAUGH, PRINTER TO THE STATE OF PENNSYLVANIA
1912.

PREFACE.

This outline of some of the essentials of "Bill Drafting" was prepared as a paper to be read at the Annual Meeting of the National Association of State Libraries, held at Ottawa, Canada, in June 1912. This edition is issued in response to numerous requests for copies.

While the subject is treated in the barest outline, it is hoped that this article may lead to a wider knowledge and discussion of a subject so vital to our legislation in Pennsylvania.

James McKirdy,
Assistant Director,
Legislative Reference Bureau

BILL DRAFTING*

When I received from our worthy President a request that I prepare for this meeting a paper on Bill-drafting, I was greatly tempted to decline. There are so many among you, by learning, by ability and by experience, better qualified than I to undertake this work, that it seemed presumptuous in me to accept. However, when I came to realize thoroughly that the chief function of a paper read at our meetings is to stimulate thought and discussion, my misgivings left me in a measure; and it is with a lighter heart, as well as a deep appreciation of the honor, that I essay the task.

Before taking up the subject in detail, I need hardly do more than refer briefly to the great popular outcry of the present time against our laws and our methods of making and interpreting them. To the mind of the average man the making of laws is one of the easiest things in the world. The electors all over our broad land go to the polling place and cast their ballots for legislative representatives chosen at random from among the people. And these legislators, the electors think, must, through some mystic power, become ipso facto vested with the skill and the knowledge requisite in drafting and enacting wise and comprehensible laws.

As Ordronaux in his work on Constitutional Legislation says, "The right to make laws being the political heritage of every citizen in a republic, the knowledge necessary to frame them is assumed to come to him by intution." Yet, to quote from Mill on "Representative Government," "There is hardly any kind of intellectual work which so much needs to be done, not only by experienced and exercised minds but by minds trained to the task through long and laborious study, as the business of making laws." But among thinking men, among those whose

*Paper read at the annual meeting of the National Association of State Libraries, held at Ottawa, June, 1912.

thoughts ultimately are carried into action, there is an increasing appreciation of the necessity of greater knowledge, of greater care and skill in the drafting of our laws. How is this to be brought about? We cannot change our form of government. It must still continue to be representative in theory at least, however it may be in practice. We cannot choose as our representatives only those who have the skill and experience necessary in the drafting of bills. How then, is the problem to be solved? A number of solutions have been proposed: some very practical; some absurd in the extreme. The solution which seems to promise the best results, and the one to which we shall, for our present purposes, confine our attention, is the one that aims to provide for the members of the state legislature a permanent body of men, skilled in the drafting of legislative bills, and thoroughly familiar with the laws of the particular state and the judicial decisions thereon, specialists in lawmaking, as it were. From his constitutents the legislator will ascertain the defects in the existing law, or the new phases in modern society that necessitate new legislation. The draftsman receiving these ideas can put them into the form of a bill, which if it becomes a law, will fit into and form a homogenous part in the general statute law of the state. Thus there will arise in time a new profession, that of the specialist in legislation, the legislative draftsman.

Before taking up the main subject of Bill-drafting, it might not to be amiss to discuss briefly the qualifications requisite in a member of this new profession. Please remember that we are now talking of the ideal draftsman. None of us can attain this ideal; but toward it we may ever strive as to an eagerly sought goal.

In the first place, the ideal draftsman must have the faculty of expressing clearly and succinctly his ideas in words. However great his learning, however long his experience, if he cannot cloth his ideas in suitable language, he must leave bill-drafting to others. Lawyers do not often have this faculty; judges rarely possess it; and, unfortunately, it is often lacking among the members of the legislature. As a writer in a recent number of the American Law Review says: "It is

foolish to assume that all lawyers can draft statutes. Such work requires a concentration of mind and of expression that few men have." This power of concentration and expression, however, may be cultivated by assiduous practice. I shall refer to this later. The draftsman might profitably pay heed to the advice of the late Justice Stephen of England, who said that he "was not accustomed to use language with that degree of precision which is essential to everyone who has ever had to draft Acts of Parliament, which, although they may be easy to understand, people continually try to misunderstand, and in which, therefore, it is not enough to attain to a degree of precision which a person reading in good faith can understand; but it is necessary to attain, if possible, to **a degree of precision which a person reading in bad faith cannot misunderstand.** It is all the better if he cannot pretend to misunderstand it."

The next thing that we shall ask of our draftsman is a wide knowledge of the law of his particular state. This is an obvious necessity. Without a clear and comprehensive knowledge of his state law as a whole, he is unable to judge either of the form or the fitness of the bill he may be called upon to frame. This knowledge must include not only the statutory law, but as well the decisions thereon by the various courts. A careful study of these decisions will often show both the strength and the shortcomings of the laws framed by the legislature of his state.

Further than this, he must have an intimate acquaintance with the constitution of his own state, and of the judicial interpretations of the various sections of the same. Unless he knows the limits within which, by the organic law, he must labor, he is unable to judge of the possible validity of his bill should it become a law. Another set of conditions must be familiar to him, namely, those imposed upon the several states by the federal constitution. He should, by repeated reading and study, become thoroughly acquainted with its provisions and with the judicial interpretations made thereon by the Supreme Court of our land.

Lastly, the draftsman must carefully study the standard works on construction of statutes. Bill-drafting is synthetic;

statutory construction is analytic The one is the converse of the other. By careful study of precedents in construction our draftsman will learn to avoid the pitfalls and dangers that others have encountered. By careful attention to this the draftsman will leave less work for the courts to do, and will go far toward removing that ground of common reproach; that the judges often make our laws for us.

Let us assume, then, that our draftsman possesses all these requirements, what must he next do? He must practice, practice, practice. He must examine laws; not with an eye single to the content, but with his mind centered on their phrasing. Have the ideas been expressed clearly? Have they been expressed briefly? Could the ideas have been stated otherwise and have gained in clearness and brevity by the change? He must answer all these questions. He must recast laws. He must strive to compress; to be concise; to express himself with a minimum of words and yet with a maximum of clearness. As Ilbert, the official draftsman of the British Parliament, says, "Every superfluous word may raise a debate in Parliament and a discussion in court." Our draftsman must look for models, and study them. He must find out the secret of their clearness and their brevity; and then practice, practice, practice. A valuable aid in this direction are the little manuals on precis writing, published mostly in England. A careful study of them will greatly repay the draftsman for the time and effort he bestows on it.

Our draftsman, our ideal, with all the knowledge and skill required by study and practice, is now ready to enter on his labors, ready to begin actual, practical work. This brings us to the real theme of this paper: Bill-drafting.

In laying down what I think are the fundamental rules of this difficult subject, I do not wish to be understood as even intimating that the following suggestions are more than a resume or outline of its salient features. A text-book on Bill-drafting remains to be written. This paper is intended only as a summary of a few, a very few, of the leading principles.

In the first place, the draftsman should have a clear, comprehensive idea of the subject of his bill. There is a well defined distinction between the subject and the purpose of a legislative measure. For example, let us say the draftsman is

asked to prepare a bill restricting the carrying of concealed weapons. The **subject** of this bill is the regulating or perhaps even the prohibiting of the carrying of such weapons. The **purpose** of the bill is to **prevent** the carrying of the weapons, and thus conserve the peace and security of the citizens. But it is clear that unless the law is very faithfully and rigidly enforced, the carrying of such weapons will not be **prevented** The word "prevent" then should not be used in the title of such bill. This distinction may seem over-refined, judging from our example; but if the draftsman will always bear this distinction in mind, he will attack his problems much more intelligently than would be the case if he totally neglected to note this difference.

As an aid to a clear comprehension of the subject of his bill he must, if he can, supplement the suggestions received from the legislator or department chief with knowledge of his own of the actual conditions which call for this bill. A good draftsman must be a wide reader. He must at any cost keep closely in touch with the trend of modern legislation, not alone in his own state but in all modern countries. He must have a good working knowledge of the latest political and sociological theories. And what is more, he must know the leading arguments both for and against them. He must know well the local conditions obtaining in his own state, and not only in the entire state, but also in the more important subdivisions of it.

Having then a good grasp of the subject of his bill, and a more or less intimate knowledge of the conditions which call for the measure, he must first **examine carefully** the laws of his state to see if there is not already on the statute books a law covering this very subject. Perhaps there may be one, but not quite in point; one which, however, by a slight amendment might serve the purpose well. If the amendment then will answer, let him draw his bill accordingly. And in this connection he should always bear in mind that he should be practical. He is dealing not with abstract theories but with actual conditions—with actual, practical men and not with shadows. Let him take Lord Thring's apothegmn to heart: "Bills are made to pass as razors are made to sell." In other words, he must remember that the exigencies at-

tending actual lawmaking easily determine the fate of the measure he has drafted; or if not the fate, they determine its final form or arrangement; so that, ceteris paribus, an amendment or a supplement is easier to pass than a new or original measure.

Next, the draftsman must study the decisions of the various courts, especially the courts of last resort, to ascertain how this particular subject has been treated by the judiciary, or how similar bills have been regarded. This is always of the highest importance and should never be overlooked.

We shall assume, though, that a new measure is necessary, and not an amendment. If the subject is one where the conditions are not peculiar to his state, the drafsman should go over the laws of other states to see what the legislatures there have done on that point. If a law is found that wholly or partially suits his purpose, he must see how it has been construed by the courts. It is a well known rule of construction, that where a statute of another jurisdiction is adopted in whole or in part by a state and enacted as a law by the state adopting it, it is presumed that the judicial construction of the statute made by the courts of the first state is adopted along with the statute. And this rule applies generally to single words or phrases borrowed from other enactments. In this construction defects may have been pointed out or ambiguities explained. He should, furthermore, ascertain, if possible, how the law has operated in that state and whether it has proved to be practical and capable of easy enforcement.

The draftsman should not overlook the laws of the other English-speaking countries: Great Britain, Canada and Australia. Most excellent work along the lines of sensible legislation and the proper drafting of bills is being done in those countries.

But with all this, he must guard against mere copying of the work of others. Nothing that man does is perfect; so the ideal draftsman will always strive to improve on the work of other draftsmen, howsoever great be the fame they have.

We assume that in all his work so far our draftsman has kept sedulously in mind the constitutional limitations of his own state and of the United States. Of course, to us in Penn-

sylvania, more than in almost any other state, this is of paramount importance. But even in states where the restrictions are not so great, it is well not to lose sight of these possible limitations that determine, possibly, the scope of the measure being drafted. And while on this point I may be permitted a suggestion that might prove helpful. An analytically indexed list of subjects upon which legislation is forbidden by the state constitution, or by the national constitution, should be prepared and referred to very frequently. In this list should be included the restrictions, not amounting to a prohibition, mentioned in the aforementioned constitutions.

Coming down now to the actual work of preparing the bill, the draftsman should sketch out his measure in rough outline. This sketch should show briefly the purport of each proposed section; its relative importance and its relative position. These sections should be arranged in logical sequence. The beginner will be surprised to learn how great a bearing this has on the actual consideration of the measure by the legislature, and on its construction by the courts. A good draftsman will always recognize the great role psychology plays in legislation; and, let me say it with due deference, in judicial matters. That which is carefully and logically arranged is easier to understand, and induces a more friendly and favorable consideration than one which imposes a greater burden on the memory and the understanding.

The draftsman should make his sentences short and his sections small. This is not always possible; but is always desirable. Naturally it makes for ease in understanding the bill, and minimizes the possibility of error. A long and complex clause should be cut up into sub-sections. Long, involved sentences, so frequently seen in bills, are an abomination. If the nature of the subject is such that a classification or an enumeration of persons or things is necessary, they may be arranged under numbered or lettered heads, with a general clause referring to them as a whole.

When the bill has been drafted the title should be drawn, and not before then. In Pennsylvania and a number of other states the title of a statute is of prime importance, being, in

fact, a part of the bill. Some constitutions require that it state clearly the purport of the bill. It is essential, then, that the title be drafted last to fit the bill; and not, as is often the case, the bill to fit the title. And when the title is drawn, it should be read in connection with each section of the bill to the end that it may clearly express the whole subject of the measure. On the other hand, the draftsman should not fall into the error of making it an index of the contents of the bill. This is not only **not** necessary but even dangerous, as the courts in their construction of the statute may infer that the items enumerated in the bill are all that the legislators intended to enact, and therefore, sections not thus indexed may be declared unconstitutional. A good method is to make the title as general and as brief as possible.

Thus far I have confined myself to a rough outline of the qualifications requisite in an ideal bill draftsman, and what might loosely be termed the technique of drafting. There remain to be considered a number of general rules which must be ever born in mind by one drafting a legislative measure. I shall not attempt to formulate these rules in set terms, but shall merely offer and discuss them as suggestions recommended to the careful consideration of anyone who wishes to become proficient in his work. Nor, furthermore, does the arrangement of them, or their relative position, have any bearing on their importance.

I shall begin with the subject of definitions, although in the eyes of many this is of least importance. There is no one who does not know that nine-tenths of all discussions in this world could be avoided if the disputants at the outset would agree on their definitions. So it is in bill-drafting. In order to make things clear beyond the shadow of a doubt, it has become customary of late years to define certain terms which lie at the heart of the subject of the bill. There is hardly any doubt regarding the advisability of this. One great authority in England advises against them, but advances no sound reasons in favor of his position. In this country at least the practice seems to be a growing one, and has been adopted by the ablest workers in this field. There is, however, some dispute as to the proper place of the definitions; whether they

should be placed at the beginning or at the end of the bill. I hold most emphatically with those who would place them in the first section. If they are so placed, the lawmaker, the judge, the lawyer, or the layman, reading the law, starts forth with a clear idea of the words and phrases which are used most frequently in the law, or which are of the greatest importance in understanding it.

But in the definitions great care should be exercised to use no word nor phrase that is ambiguous. In some states the plan is being adopted of having the legal definitions of certain frequently recurring words and phrases grouped in one act, known as a Construction Act, or Interpretation Act. Great Britain set us an example in this regard years ago.

The draftsman should never in the same bill use a word in different senses; nor should he use different words to express the same thing.

The draftsman should be very careful in his use of adjectives and relative pronouns; and still more careful in his use of participles used as adjectives after the noun or nouns they modify. English is a language practically devoid of inflections, so that the meaning of a word is greatly influenced by its relative position.

"Nouns should be used in preference to pronouns, even though the noun has to be repeated." As Thring says: "Repetition of the same word is never a fault in business composition if an ambiguity is thereby avoided."

Some draftsmen pay great attention to the tense of the verbs they use. Lord Thring says: "Acts of Parliament should be deemed to be always speaking, and, therefore, the present or past tense should be adopted, and "shall" should be used as an **imperative** only, and not as a **future.**" This is, however, to my mind an open question, to be settled by each draftsman for himself.

The question whether a sentence in a bill should be put in the affirmative or in the negative form is an important one. To quote Lord Thring again: "The greatest caution must be used in putting a sentence in a negative form, as it makes the performance of the conditions a matter of absolute necessity, and the omission of the smallest portion of them will

render certain acts altogether nugatory. On the other hand, if the affirmative expression alone be used, the court will consider the enactments as to the conditions as **directory** and dispense with them on due cause being shown for their omission" As an example of the negative form let us take the following: "No appeal shall be entertained unless the following conditions have been complied with." In this case, unless certain conditions are compiled with, an appeal may not be entertained. Let us now put it in the affirmative form: "Any person may appeal to such and such a court subject to the following conditions and regulations." Here the court has a wise discretion allowed it. It has the power of remitting certain of the conditions and regulations upon good cause therefor being shown. Which of these two forms should be used will always depend on the subject matter of the bill, or the intent of the legislature, and on the general policy of the state.

Provisos should be kept out of his bill. If there has to be an exception, let him state it succinctly in a short section following the main one to which the exception is made. And let him remember that provisos are often construed strictly. They often endanger the entire bill. The courts in interpreting a proviso generally confine it to that which immediately precedes, or to the section to which it is appended, unless it is clearly intended to have a wider scope.

As to preambles, I should advise against their use unless the draftsman or his client thinks it essential to the passage of the measure. If he must have one, he should so frame his bill that it will be intelligible without resorting to the preamble for explanation.

The question of repeal is also a very important one. If the bill is liable to introduce sweeping changes in the law, the repealing clause should be given the most careful attention. It would be well to make the repeal very broad so as to include all special and local laws, if the bill being drafted is meant to apply to the whole state. And it is well to insert in a repealing clause a sentence to the effect that the repeal of a prior law will not operate to revive any law not in force at the time of such repeal. Curious legal complications have

arisen through disregard of this. Instead of repeating this clause at the end of every bill, it will be better practice to induce the legislature to enact a general law on the subject applicable to all repeals. Some states of the Union have already enacted such a statute.

Before leaving the subject of repeals let me remind the draftsman that repeals by implication are not favored by the courts. If he intends by his bill to widen the scope of a prior act, or to supersede it, let him see that the prior act is repealed in express terms. Further than this, he must not forget that a repealing statute is generally construed retrospectively; so that unless he intends otherwise, he should insert a provision in the repealing clause to the effect that such repeal will not affect any act done, right vested, duty imposed, penalty accrued or proceeding commenced, before the date of such repeal. In this connection one should remember that where there is a prior act on the same subject as the bill in hand, the latter will, if it become a law, be interpreted with reference to the former.

In preparing a bill whereby certain things are prohibited or certain things are commanded, care should be taken that the enforcement of the act be given as a duty, in set terms to some department or to some official. Everybody's business is, alas, so often nobody's business.

The draftsman should not follow several special terms with a general term. For example: "It shall be unlawful for any farmer, drover or any other person to, etc." The courts have applied to this sort of enumeration a rule called the "ejusdem generis" rule, whereby the application of the law is limited to persons or things of the kind or class specifically mentioned.

Penal and criminal statutes are always strictly construed. The draftsman, then, should so frame such bills that their intent would be very clear, both as to meaning and scope. Further, in the preparation of a penal or criminal measure, or of a clause fixing a penalty, he should endeavor to adhere to the general policy of his state in such matters. He should, in this connection, examine the penalties fixed in statutes enacted in similar or analogous cases. Caution

should be exercised in fixing minimum penalties. My personal opinion is that they should never be used.

Again, in drafting penal or criminal measures where provision is made for summary conviction, great care should be taken to see that the clause reads as clearly as possible. The draftsman must bear in mind, in this connection, the constitutional rights of the citizens of the state; and he must remember that statutes authorizing summary proceedings will be construed with great strictness, and must be exactly followed by those whose duty it is to enforce them.

Statutes in derogation of the common law and in derogation of the common right will be strictly construed.

In drawing a bill dealing with judicial procedure, the draftsman must not fail to except from its operation actions at law already begun, unless he intends to include them.

The draftsman should early learn to distinguish between statutes and provisions which are mandatory and those which are merely directory. Every bill should be so clearly drawn that there can be no ambiguity on this point. The courts have no hard and fast rule in their determination of questions of this nature. The meaning and intention of the legislature govern. If the bill is clearly and unequivocally drawn the intent of the legislature will be plain.

In the preparation of amendments the draftsman should remember that the amendment becomes to all intents and purposes a part of the amended law. He should, then, when drafting the amendment, read over carefully the entire original statute with the amendment in its intended place. He will thus be better able to grasp clearly the full force and effect of his measure. It is well also to remember that unless the contrary intention appears, the amendment will be construed as applying only to facts or things subsequent to its enactment. This despite the fact that the amendment becomes, as I stated, a part of the original act.

The careful draftsman will never draw any measure purporting to construe any prior law or part of a law. The right to construe statutes lies solely with the judiciary. It is a right that is sedulously and zealously guarded. The same end can be attained by the draftsman if he redrafts as a bill the

entire prior law, making the changes deemed necessary. Then the old law should be specifically repealed.

He should not attempt to draw up a tax or revenue measure, or one amending such a law, unless he is thoroughly familiar with the system of taxation in his state. In many states, on account of ill considered tinkering with the laws, the state revenue system is in a most deplorably chaotic condition.

Finally, as a parting suggestion to the draftsman, I should advise him, especially if he is a state official, to hold himself in readiness at all times to explain the reasons for the phraseology and arrangement of his bill, and to explain the effect of it if it become a law. To this end it would be well for him to brief up all his reasons in the same manner as a careful lawyer prepares his case.

For the benefit of those who may wish to make a study of the subject of bill-drafting, I have added a list of works that will be very helpful:

Beal, Edward,
Cardinal Rules of Legal Interpretation.
London, 1908.

Bentham, Jeremy,
A General View of a Complete Code of Laws.
Nomography or the Art of Inditing Laws.

Bishop, Joel Prentiss,
Commentaries on the Written Laws and Their Interpretation.
Boston, 1882.

Black, Henry Campbell,
Interpretation of Laws.
St. Paul, Minn., 1911.

Black, Henry Campbell,
Constitutional Law.
St. Paul, Minn., 1910.

Bruncken, Ernest,
Hints on Drawing Legislative Bills.
Legislative Reference Bulletin No. 1.
California State Library, 1908.

Buckalew, C. R.,
An Examination of the Constitution of Pennsylvania, 1883.

Coode, George,
Legislative Expression.
1852 (second edition).

Cooley, Thomas M.,
Constitutional Limitations.
Boston, 1903.

Craies, William F.,
A Treatise on Statute Law.
London, 1907.

Dicey, A. V.,
Conflict of Laws.
London, 1908.

Dwarris, Sir Fortunatus,
Statutes and Constitutions.
Albany, 1875.

Endlich G. A.,
Interpretation of Statutes.
Jersey City, N. J., 1888.

Freund, Ernst,
Police Powers.
Chicago, 1904.

Gael, Samuel Higgs,
Legal and General Composition.
London, 1840.

Gilbert, Frank B.,
(Bill Drafting Bureau, New York Legislature).
Statutes. Legislation Bulletin 22b. Review of Legislation, 1903. New York State Library.

Goodnow, F. J.,
Comparative Administration Law (two volumes).
New York, 1893.

Griggs, John W.,
Lawmaking.
Reports American Bar Association, 1897.

Hutchins, F. E.,
Construction—Some of its uses and abuses.
Reports Ohio State Bar Association. 1897.
Ilbert, Sir Courtenay,
Legislative Methods and Forms.
Oxford, 1901.
Lapp, John A.,
Hints on Bill-drafting.
Bulletin No. 4. Legislative Reference Department. Indiana State Library, 1910.
Law, the Making and Revision of.
Papers read at Fourth Annual Meeting (1907) of the American Pol. Sci. Association.
Lieber, Francis,
Legal and Political Hermeneutics.
St. Louis, 1880.
Maxwell, Sir Peter Benson,
Interpretation of Statutes.
London—Toronto, 1905.
Monett, F. S.,
Statutory Construction.
Reports Ohio State Bar Association. 1895.
New York State Library,
Year Book of Legislation.
Oliver, A. L.,
Statutory Revision.
Reports Missouri Bar Association. 1908.
Ordronaux, John,
Constitutional Legislation.
Philadelphia, 1891.
Prentice, W. P.,
Police Powers.
New York—Albany, 1894.
Russell, Alfred,
Police Powers.
Chicago, 1900.
Sanderson, J. F.,
Validity of Statutes in Pennsylvania.
Philadelphia, 1898.

Sedwick, Theodore,
Construction of Statutory and Constitutional Law.
New York, 1874.

Smith, E. Fitch,
Commentaries on Statute and Constitutional Law and Statutory Construction.
Albany, 1848.

Stimson, Frederic Jesup,
Popular Lawmaking.
New York, 1910.

Stimson, Frederic Jesup,
Federal and State Constitutions.
Boston, 1908.

Stimson, Frederic Jesup,
American Statute Law (two volumes).
Boston, 1886.

Story, Joseph,
Conflict of Laws.
Boston, 1883.

Sutherland, J. G.
Statutory Constitution (second edition by John Lewis).
Chicago, 1904.

Symonds, Arthur,
The Mechanics of Lawmaking.
London, 1835.

Thring, Henry, (Lord)
Practical Legislation.
Toronto—Boston, 1902.

Wade, William P.,
Retroactive Laws.
St. Louis, 1880.

Wharton, Francis,
Conflict of Laws.
Rochester, 1905.

White, Thomas Raeburn,
Commentaries on the Constitution of Pennsylvania.
Philadelphia, 1907.

Wilberforce, Edward,
Statute Law.
London, 1881.
Willard, Ashton R.
A Legislative Hand Book.
Boston—New York, 1890.
Wyman, Bruce,
Principles of the Administrative Law Governing the Relations of Public Officers.
St. Paul, 1903.